EXHIBIT 1

Plaintiffs' More Definite Statement as to Defendants Al Farooq Mosque, Mohammed Al Massari, Abu Hafs the Mauritanian, Agus Budiman, Ahmed Ressam, Said Bahaji, Zakariya Essabar, Mohammed Ali Hasan Al Moayad, Ibrahim Muhammad Afandi, Abdulrahman Hassan Sharbatly, Ahmed Zaki Yamani, Ahmad Al Harbi, Mohammed Al-Issaim, Hamad Hussaini, Mohamed Loay Bayazid (a.k.a. Abu Rida Al Suri), Ahmed Brahim, Abu Musab Al-Zarqawi, Ayman Al-Zawahiri, Abu Ibrahim Al-Masri, and Mohammad J. Fakihi

1. Plaintiffs hereby incorporate all allegations and counts contained in the Complaints for World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC) and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC).

Al Farooq Mosque

- 2. Federal affidavits filed in the Mohammed Ali Hassan al-Moayad case show a Yemeni al Qaeda fundraiser and professed friend of Osama bin Laden told a federal informant that money was being collected at the Al-Farooq mosque in Brooklyn, NY for the purposes of supporting jihad and Osama bin Laden. Jihad fundraising sessions were conducted at the Al-Farooq mosque in December 1999. The total amount of money collected in a single two-day period was reported as around \$10,000.
- 3. Al-Farooq had previously served as the headquarters for the Al-Kifah Refugee Center, the U.S. branch of Makhtab-e-Khidamat al-Mujahideen ("Office of Mujahideen Services")—named by the U.S. government as a Specially Designated Global Terrorist entity (SDGT) and labeled as the "direct precursor" to al Qaeda.
- 4. The Al-Farooq mosque was a frequent host to lectures by al Qaeda founder Abdullah Azzam and Egyptian Al-Gama`at al-Islamiyya leader Sheikh Omar Abdel Rahman.

Mohammed Al Massari

- 5. Muhammed Al-Massari is the head of the Committee for the Defense of Legitimate Rights (CDLR). CDLR is among the most militant Islamic fundamentalist groups in the world. In the weekly newsletter *Al Huquq*, Al-Massari attested in June 1996 that, "the battle against the Jews is a specific obligation on all Muslims until they annihilate them and drive them out of Palestine." After the bombing of a U.S. facility in Riyadh in 1995, he explained that the presence of American forces was a colonialist one that violated Islamic law. He indicated that although the Saudi government was the particular target of such acts of terrorism, "the Americans were an easy target on the road, which does not cause ideological or religious problems." Muslih Shamrani, one of the terrorists convicted in the Riyadh attack, cited Al-Massari as one of his primary ideological influences.
- 6. A Denver-based group headed by Dr. Al-Massari known as the Action Committee for the Rights of Middle East Minorities is directly linked to a man named Khalid Fawwaz.

 Fawwaz is listed in U.S. District Court criminal documents as a co-conspirator in the 1998 East Africa bombings and the leader of an organization called the "Advice and Reformation Committee," created by Osama Bin Laden. In August 1996, Fawwaz transmitted a statement from Bin Laden stating publicly that "the United States forces stationed on the Saudi Arabian peninsula should be attacked."
- 7. CDLR is the lead sponsor and sits on the Board of Trustees for the Islamic Gateway website (http://www.ummah.net). The Islamic Gateway provides free webspace to radical Islamic organizations, and its administrators actively defend, promote, and publicize these groups and their violent messages of hate and intolerance. Al-Massari is Islamic Gateway's Chairman of the Board. CDLR's website on the Islamic Gateway has become a

hotbed of anti-Western condemnations and calls to violence. The group published many of its communiqués and documents directly on the site. The statements admonish Muslims that "your rights and freedom will not be presented to you on a plate by your arrogant oppressors, but they will be seized by the honourable people who have grown tired by such continual oppression... the oppressors must be made aware of the fact that the Muslim Nation has become enraged and exasperated with those who oppose and defy their faith, despoil their honour and deprive them of their dignity." In the wake of the bombing of the U.S. Khobar Towers military barracks in August 1996, an online communique called upon "all Muslims all over the world to be on full alert to foil the conspiracy of the US and the Zionists, together with their Al-Saud puppets." Another communique on the site lauded the bombing attack as "only one manifestation of evolving reality of the coming battle being forced on all Muslims, not only those of the Arabian Peninsula... but of the whole world." The document went on to warn that if the American presence continued in the Middle East, "many disappointed young men and women may resort to violence and bloodshed."

8. On February 11, 1998, Al-Massari was one of the principle authors of a declaration of war against the U.S. and British governments for their policy on Iraq. The fatwa, or religious edict, represented "a message for the US and the British Governments or any other government of non-Muslim countries... to stay away from Iraq, Palestine, Pakistan, Arabia etc. or face a full scale war of Jihad which will be the responsibly [sic] and the duty of every Muslim around the world to participate in." Moreover, it called upon all Muslims worldwide "including the Muslims in the USA and in Britain to confront by all means whether verbally, financially, politically or militarily the US and British aggression."

Abu Hafs the Mauritanian (a.k.a. Mahfouz Ould Al-Walid, a.k.a. Khalid Al-Shanqiti, a.k.a. Mafouz Walad Al-Walid)

- 9. The 9/11 Commission Final Report called Abu Hafs the Mauritanian (a.k.a. Mahfouz Ould Al-Walid, a.k.a. Khalid Al-Shanqiti, a.k.a. Mahfouz Walad Al-Walid) a senior al Qaeda "theologian." He is the operational planner thought responsible for helping to organize the 1998 bombings of two U.S. embassies in East Africa and an attempted series of terrorist plots to coincide with the Millenium—including bombing attacks at Los Angeles International Airport.
- 10. The 9/11 Commission report stated that would-be al Qaeda terrorist operatives—including some of the actual 9/11 hijackers—would approach Abu Hafs the Mauritanian if they were seeking to "participat[e] in a suicide operation."
- 11. Abu Hafs the Mauritanian is related through marriage to Mohamebdou Ould Slahi and is believed to be his associate within al Qaeda. Slahi, a resident of Duisberg, Germany, helped recruit and organize at least two separate networks of terrorist sleeper cells—including the 9/11 hijackers.

Agus Budiman

- 12. FBI special agent Jesus Gomez linked Agus Budiman, an Indonesian driver for a food delivery service, to three 9/11 hijackers, including suspected ringleader Mohammed Atta and two others believed to have close ties to the terrorists.
- 13. Gomez testified that Ziad Jarrah, the official hijacker-pilot of Flight 93, used Budiman's name to get into the United States, and Ramzi Binalshibh tried twice unsuccessfully to use Budiman's name to get into the country.
- 14. In late November 2001, Budiman was officially charged for helping a man named Mohammad Bin Nasser Belfas obtain a false Virginia driver's license.

Ahmed Ressam

- 15. Ahmed Ressam, a native of Algeria, fled his homeland after being accused by Algerian authorities of arms-trafficking for Islamic fundamentalists in North Africa. He traveled first to France, and then to Montreal in 1994. Unable to find employment, he turned to petty crime as a means to finance his desired lifestyle in the West.
- 16. In June 1995, a Canadian judge found Ressam guilty of shoplifting, fined him \$100, and ordered him to leave Canada by July 23, 1995. Ressam's deportation order was never executed by Canadian Immigration officials, and Ressam never left.
- 17. Ressam developed his skills enough to gain the attention of a wealthy and influential member of the Montreal Muslim community who was working closely with Ressam's then-roommate, al Qaeda operative Fateh Kamel. At the time, Kamel was using his storefront business as a cover for his growing role as an international terrorist mastermind. He employed Ressam as an invaluable source of passports, credit cards, petty theft, and the other necessary functional tools of terrorist activity. French Judge Jean-Louis Bruguière later testified in U.S. court that Fateh Kamel had become the leader of yet another "conspiratorial cell," this time based out of Montreal."
- 18. Kamel and others at Place de la Malicorne drew Ahmed Ressam deep into their world of radical Islam. The men discussed the GIA terror attacks in France and agreed that it would be a good thing to carry out another operation in France in the future. They brought Ressam into the mosque to listen to the wisdom of Abderraouf Hannachi, an older Tunisian-born man who originally came from a rural family in Tunisia and immigrated to Canada in 1994 "to make a life for himself, like other Tunisians." Hannachi had few successes at finding employment with little education or formal experience. But, Hannachi was always regular about

his daily visits to the local As-Sunnah An-Nabawiya Mosque in Montreal, where he was considered a respected and influential personality. At the As-Sunnah mosque, Abderraouf Hannachi railed against Western culture as a regrettable disease and expressed his burning hatred of the United States. He also spoke proudly of how he had been trained by al Qaeda experts at the Khalden camp in eastern Afghanistan and how this life was only meaningful if offered as sacrifice for the next.

- 19. The Malicorne gang all worshipped Hannachi and Fateh Kamel, who were highly respected as men of status in the local Muslim community. Ressam and the others dreamed of achieving similar glory in the name of Islam and began planning their own *jihad* fantasy.
- 20. In the trial of one of his co-conspirators, Ressam testified that he became firmly convinced to join the *mujahideen* after several of his friends returned to Montreal in 1997 from al Qaeda camps in Afghanistan. According to Ressam, "My friends came back and talked to me about the training that they have received, the learning that they have gotten, and about jihad, and I got—they encourage me—so I got interested." He further explained that he had approached Hannachi, "a friend who was [formerly] in Afghanistan," to arrange the details of his own planned journey to join al Qaeda. Several members of the Malicorne gang quietly left Montreal in March 1998 on a quest to seek military training in Afghanistan. Ressam flew to Karachi, Pakistan, where Abderraouf Hannachi had arranged contacts for him with notorious Afghano-Bosniak terrorist training camp manager Abu Zubaydah.
- 21. In court, Ressam explained Abu Zubaydah's role in the al Qaeda network: "[h]e is the person that is charge of the camps. He receives young men from all countries. He accepts you or rejects you. And he takes care of the expenses of the camps. He makes arrangements for you when you travel coming in or leaving." In Karachi, Abu Zubaydah gave Ahmed Ressam a

new identity, Afghan clothes, and an authorized letter of transit to a guesthouse in Jalalabad. Shortly thereafter, Ressam was moved on to the nearby Khalden training camp. The camp had about 100 total men, divided into cells of between 6 and 14 recruits each. The cells were taught to exist and operate independently of any central command structure. At the Khalden camp, Ressam took part in military training conducted by two members of the Jordanian Millenium terror cell identified as "Khaled" and "Mughirah."

- 22. According to Ressam, at Khalden, they learned "how to blow up the infrastructure of a country... Electric plants, gas plants, airports, railroads, large corporations... Hotels where conferences are held." While in Afghanistan, Ressam also participated in gruesome chemical weapons experiments on dogs and learned "how to mix poisons with other substances, put them together and smear them on doorknobs... designed to be used against intelligence officers and other VIPs."
- 23. At "theoretical sessions," members of the cells studied and discussed strategy behind past terror operations, including *Hizballah*'s war against the U.S. in Beirut and the failed 1995 assassination plot on Hosni Mubarak in Addis Ababa. Every Friday at Khalden, they would all meet and discuss ways to establish terror support networks on the ground in Algeria, Europe, and North America. Al Qaeda religious and military officials, such as Shaykh Omar Abdel Rahman's son Asadallah, would lecture to the cells about important targets and the priorities of the *jihad* movement.
- 24. Ressam later testified in court, "we were speaking about America as an enemy of Islam." In particular, he recalled a *fatwah* distributed widely in the Afghan camps "issued by Sheikh Omar Abdel Rahman with his picture on it… It said it was a fatwah by Omar Abdel Rahman from prison. It says fight Americans and hit their interest everywhere." A copy of this

very same *fatwah* was reproduced and distributed on a short-lived Arabic-language website created by fellow Millenium terror conspirator Khalil al-Deek.

- 25. On October 14, 1998, while Ahmed Ressam was making final preparations to return to North America, Canadian authorities apprehended his handler Karim Said Atmani at Niagara Falls, when he tried to cross into Canadian territory from the U.S. with two other Algerians. He was traveling on a fraudulent Canadian passport that had apparently already allowed him to breach immigration controls in the United States; he was also found in the possession of stacks of stolen credit cards taken from unwitting British and Asian tourists. French counterterrorism experts now believe that Atmani was attempting to enter Canada in order to play a central role in the Millenium bombing conspiracy with Ahmed Ressam.
- 26. In late 1998, Ressam met with several other cell members and al Qaeda representatives in Afghanistan. They agreed to return to Canada in three carefully programmed phases. Atmani, mostly likely back in central Bosnia during the summer of 1998, was scheduled to arrive in Montreal in the third and final phase. Upon the successful return of all the cell members, Atmani, Ressam, and the others were planning to commit a series of Roubaix-style operations (mainly bank robberies) in order to finance a major terrorist strike against the United States; specifically, a massive bomb explosion at Los Angeles International Airport coinciding with the start of the new millennium. The choice was made because "an airport is sensitive politically and economically."
- 27. Ressam later admitted in court the chilling details of his plan: "I will go to the city of Los Angeles. I will surveil the airport. I will survey the airports until I find one—a good one, and then I will bring a cart that is used for luggage. I will put the cart in a place that is not suspicious and then I will observe the reaction of security, how long it took them to observe it...

this was for rehearsal only." Upon the execution of the actual plot, "I will first try to put the explosives in one suitcase and if there was not enough room in one suitcase, then I would use another suitcase."

- 28. With Atmani's expulsion, the cell was starting to fall apart. Ressam had made it safely back to Montreal, but minus one of his most experienced jihad partners. He tried contacting Atmani in Bosnia, but the latter now refused to come back to Canada to carry out an operation. Atmani was clearly a known figure in European and North American counterterrorism circles, and it was too risky for him to once again attempt to illicitly enter Canada or the U.S. With or without Atmani, Ressam was prepared to go ahead with the mission assigned to him by Abu Zubaydah. He was given \$3,500 to help subsidize the cost of the terror attack by Hassan Zemmiri, another known veteran of the "jihad in Bosnia." Other members of the cell already positioned inside the United States were reassured by their handlers based in Montreal that Ressam "used to be in Afghanistan and Bosnia" and that "the fire is on." They referred to Ressam's imminent arrival as "a great blessing"; one conspirator later admitted that he knew exactly what this meant: "[t]his guy was coming for some violent act."
- 29. On December 14, 1999, Ressam was stopped by U.S. border patrol agents at the Port Angeles crossing near Vancouver. In his car, investigators found the precursors to terror: 100 pounds of explosives and simple timing devices. Ressam tried to escape. One Customs agent recalled, "I was looking right at him, had my weapon pointed in his direction... He quickly darted into traffic, bounced off a car, continued to run hard. And that was what really triggered me, caused me to get very nervous, when he came up to a passenger vehicle and tried to commandeer it or open the car door. I thought, 'This guy really wants to get away, and he's dangerous.'"

Said Bahaji

30. Said Bahaji, the son of a Moroccan immigrant, was the only German citizen in the Hamburg 9/11 cell. Educated in Morocco, Bahaji returned to Germany to study electrical engineering at the Technical University of Hamburg-Harburg. He spent five months in the German army before obtaining a medical discharge, and lived with Mohammed Atta and Ramzi Binalshibh at 54 Marienstrasse for eight months between November 1998 and July 1999.

Described as an insecure follower with no personality and with limited knowledge of Islam, Bahaji nonetheless professed his readiness to engage in violence. Atta and Binalshibh used Bahaji's computer for Internet research, as evidenced by documents and diskettes seized by German authorities after 9/11. Said Bahaji attended to various routine matters for Atta and Binalshibh in Hamburg, thereby helping them remain abroad without drawing attention to their absence.

Zakariya Essabar

31. Zakariya Essabar, a Moroccan citizen, moved to Germany in February 1997 and to Hamburg in 1998, where he studied medical technology. Soon after moving to Hamburg, Essabar met Ramzi Binalshibh and the other members of the Hamburg 9/11 cell through a Turkish mosque. Shortly before the 9/11 attacks, Essabar traveled to Afghanistan to communicate the intended date for the suicide hijackings to the al Qaeda leadership.

Mohammed Ali Hasan Al Moayad

32. On January 5, 2003, the United States District Court for the Eastern District of New York issued an Affidavit in Support of an Arrest Warrant against Mohammed Ali Hasan Al Moayad in *U.S. v. Mohammed Ali Hasan Al Moayad* for conspiring to provide material support and resources to al Qaeda between October 8, 1997 and December 17, 2002.

- 33. Around December 2001, Al Moayad was involved in supplying money, arms and recruits to al Qaeda mujahideen fighters.
- 34. Around January 8, 2002, an FBI witness traveled to Yemen and met with Al Moayad. Over the course of several conversations, Al Moayad told the witness that he regularly provides money to support mujihadeen fighters in Afghanistan, Chechnya and Kashmir. Al Moayad also stated that he has supplied al Qaeda with arms and communication equipment in the past. Al Moayad indicated that he worked directly for a high-ranking official in the Islah party of Yemen purchasing weapons for al Qaeda.
- 35. Around May 23, 2002, an FBI witness met with Al Moayad several times in Yemen. The witness told Al Moayad he had a contact who wanted to donate a large sum of money to the jihad, but having previously donated \$2 million to some Egyptians, whom he believed kept the money for themselves, the contact wanted to ensure that the money he donated would go to the jihad. In response, Al Moayad told the witness that he had met with Osama bin Laden on two occasions and that on each of those occasions, Al Moayad had brought money, arms and recruits. Al Moayad explained that before the September 11, 2001 attack, Al Moayad's funds and supplies went primarily to Afghanistan, but now they were being used mostly in Kashmir and Chechnya.
- 36. During one of these meetings with the FBI witness, Al Moayad also identified five individuals in New York who were sending money from the United States to him. Al Moayad provided the witness with contact telephone numbers for these individuals and also told him that he received money for the jihad that was collected at the Al Farouq mosque in Brooklyn.
 - 37. On March 10, 2005, Al Moayad was convicted in the Eastern District of New

York of conspiracy to provide material support or resources to both al Qaeda and the foreign terrorist organization Hamas.

Ibrahim Muhammad Afandi

- 38. Ibrahim Afandi is the CEO and General Manager of the Al-Afandi Establishment for Trading Industry. Al-Afandi Est. is involved in marketing and international trade, environment, cement factories, medical equipment and solar energy and is headquartered in Jeddah. In 1998, Ibrahim Muhammad Afandi was a member of the International Islamic Relief Organization (IIRO)'s newly formed Executive Council. In 1989, Ibrahim Afandi attended the first incorporation meeting of the Board of Trustees for Sana-Bell, Inc. U.S. held in Washington, D.C. Sana-Bell, Inc. was named later as a financial branch of IIRO and the Muslim World League.
- 39. Ibrahim Afandi's name was among those included in the Golden Chain- a list including 20 of some of the most successful and influential merchants in the Arabian Gulf. The list, titled "And spend for God's cause," was identified by former al Qaeda lieutenant-turned FBI informant Jamal Ahmed Al-Fadl as consisting of wealthy individuals from the Gulf region who provided bin Laden and al Qaeda with money on a regular basis.

Abdulrahman Hassan Sharbatly

40. The Sharbatly family name was among those included in the Golden Chain. The Al-Sharbatly family is the founder of Saudi Arabia's second biggest bank, Riyad Bank. The family owns major financial investments around the world, including the Golden Pyramids Plaza Co., a multi-billion dollar hotel, residential, and commercial project in Egypt. The family is believed to own a great deal of other property including 38 million square miles of land along the Jeddah-Mecca expressway. Abdulrahman Sharbatly, a principle public figure in his family, is a

major shareholder in the Golden Pyramids project and the Egyptian Gulf Bank. He is also a business partner of Salem Mohammed Binladin and founder of the Beirut-based Middle East Capital Group (MECG), with an estimated \$210 million in capital, much of it held personally by Sharbatly.

Ahmed Zaki Yamani

41. Ahmed Zaki Yamani's name was among those included in the Golden Chain. Yamani was the longtime Oil Minister for the Kingdom of Saudi Arabia. After serving loyally for many years, Yamani was suddenly dismissed from his position in the late 1980s when King Fahd apparently held him responsible for a price war with non-OPEC countries that pushed petroleum prices below \$10/barrel.

Ahmad Al Harbi

42. Ahmad Al-Harbi's name was included in the Golden Chain. Al-Harbi was a business partner of Saudi Prince Mohammad Al-Abdullah Al-Faisal in at least one venture worth over 1 million Saudi Riyals. He is also the corporate administration manager for Saudi Investment Group & Marketing (SIGMA), a conglomerate holding company set up by the late Saudi Prince Khalid, the eldest son of Prince Abdullah.

Mohammed Al-Issai

43. Mohammed Al-Issai's name was included in the Golden Chain. Al-Issai is a board member of Saudi Research Marketing Company alongside Mohammed Hussein al-Amoudi, Saleh Abdullah Kamel, Abdullah Bin Khalid Bin Mahfouz, and Dallah Albaraka Group. He is also the deputy chairman of the Arab Cement Company whose shareholders include the Saudi Binladin Group, Bin Mahfouz, and the Al-Rajhi family.

Hamad Hussaini

44. Hamad Hussaini's name was among those included in the Golden Chain. Hussaini is a board member of the Islamic Waqf Foundation in the Netherlands and is the brother of the General Director of Al-Waqf and owner of the local Al-Furqan Mosque which is linked to 9/11 hijacker Marwan el-Shehhi.

Mohamed Loay Bayazid (a.k.a. Abu Rida Al Suri)

- 45. Mohamed Loay Bayazid, (a.k.a. Abu Rida Al Suri), a Syrian-American from Kansas City, Missouri, is a former senior member of al Qaeda and a close confidant of Osama bin Laden.
- 46. Around 1985, Mohamed Bayazid first left his home in the United States in order to support the mujahideen in Afghanistan. He arrived in Peshawar around the same time as Saudi citizen Wael Jalaidan, another intimate friend of bin Laden. After making contact with Sheikh Abdullah Azzam, Bayazid traveled into Afghanistan to the Salman Al-Farisi training camp. At roughly the same time, he first met the young Saudi expatriate Osama bin Laden.
- 47. Over the next decade, Bayazid played a key role as an advisor and emissary for Bin Laden, directly aiding al Qaeda's attempts to gain chemical, biological, and nuclear weapons.
- 48. In the early 1990s, Bayazid attempted to illegally purchase South African uranium on behalf of bin Laden, only to be defrauded of thousands of dollars.
- 49. Mohamed Bayazid was last reported in the Kansas region around the period of 1994. During this time bin Laden's dissident political group, the Advice and Reformation Committee (ARC), maintained a postal correspondence address in Kansas City.

50. Mohamed Bayazid worked for a short time with Human Concern International (HCI) during the late 1980s. He was specifically responsible for acting as a coordinating liaison based in the Midwestern United States between HCI and other Islamic charitable organizations. By 1995, French intelligence sources were telling European media that HCI has a humanitarian front, but it is believed to finance terrorist and guerrilla operations. In June 1999, HCI was formally accused by the Canadian government of supporting international Islamic terrorism. On October 12, 2001, Ahmed Saeed Khadr, HCI's representative in Pakistan, was registered by the US Treasury Department as a "Specially Designated Terrorist" for aiding al Qaeda.

Ahmed Brahim

51. Ahmed Brahim, an Algerian, helped finance the 1998 bombing of U.S. embassies in Kenya and Tanzania. He was arrested in Barcelona in April 2002. Spanish Interior Minister Mariano Rajoy described the arrest of Brahim—the result of a seven-month long police investigation—as a "heavy blow to the finance apparatus of this terrorist network." Brahim had a close relationship with Mamdouh Mahmud Salim (a.k.a. Abu Hajer al-Iraqi), the former top military commander of al Qaeda in Afghanistan. Salim, a founding member of al Qaeda, is in prison in the US for conspiracy in the 1998 embassy bombings.

Abu Musab Al-Zargawi (a.k.a. Ahmed al-Khalayleh)

52. Abu Musab al-Zarqawi (a.k.a. Ahmed al-Khalayleh), a Jordanian national of Palestinian descent, joined the Arab-Afghan mujahideen in the late 1980s. Osama bin Laden and other al Qaeda commanders decided that Zarqawi would be useful in marshalling together Palestinian al Qaeda followers in a unified structure, and they helped Zarqawi to establish the "Bayat" camp in western Afghanistan.

- 53. In 2002 and 2003, Zarqawi began to extend his network throughout Turkey,

 Jordan, Iraq, Syria, Lebanon, and the Caucasus. Several followers of Zarqawi were responsible

 for subsequent terrorist attacks in the region, including suicide bombing attacks targeting

 foreigners in Istanbul, Turkey and the assassination of U.S. diplomat Lawrence Foley in Jordan.
- 54. Shortly following the U.S. invasion of Iraq in mid-2003, Zarqawi established his principle base in Iraq's Sunni triangle where he organized a relentless and deadly insurgent campaign featuring suicide bombings and the televised beheadings of Western civilian hostages. Zarqawi is allegedly personally responsible for beheading U.S. hostage Nicholas Berg in May 2004.
- 55. In November 2004, Abu Musab al-Zarqawi officially swore bayat, or an oath of allegiance, to Osama Bin Laden and became a recognized leader of al Qaeda. Under the lead of Zarqawi, al Qaeda's network in Iraq has been responsible for thousands of deaths inside Iraq and also acknowledges providing assistance to other al Qaeda movements in the region—including al Qaeda's network in Saudi Arabia.

Ayman Al-Zawahiri

- 56. Ayman al-Zawahiri is the leader of the Egyptian Islamic Jihad Movement and is considered right-hand-man to Osama bin Laden. He is the undisputed second most important leader in al Qaeda and recently took credit for the July 7, 2005 London suicide bombing attacks. *Abu Ibrahim Al-Masri*
- 57. Abu Ibrahim al-Masri was a would-be al Qaeda activist operating out of Yemen who was turned over to Yemeni security. An al Qaeda sympathizer in the state security service informed his terrorist commanders. Al-Masri was caught, escaped, caught again, interrogated, and confessed. A prolonged debate ensued as to his fate, and in the end, he was set free. It was believed that his shame before the rest of the organization was sufficient, and other terror groups

were cautioned against having any dealings with him. Masri wandered about before winding up in Afghanistan, a religious teacher at a school for the children of Arab Afghans.

Mohammad J. Fakihi

58. Mohammad J. Fakihi, director of the Islamic Affairs Department at the Saudi Embassy in Berlin, has been tied to al Qaeda and alleged September 11th conspirators active in Germany. In March 2003, German authorities detained and interrogated six suspected Muslim militants tied to the Al-Nur mosque in Berlin. One of these men, Tunisian-born Ihsan Garnoaui, was arrested after a search of his belongings uncovered a poison handbook, bomb-making ingredients, a loaded handgun, and a stolen passport. Masjid Al-Nur had already come under scrutiny for its links to Mohammad J. Fakihi. Reportedly, German investigators were also examining the role of the Al-Haramain Foundation in funding and sponsorship of the Al-Nur mosque. Shaykh 'Aqeel Ibn 'Abdul-'Aziz Al-'Aqeel, the "general director" of Al-Haramain is listed as a co-owner of the land the mosque sits on, which was purchased only months after the arrival of Fakihi at the Saudi Embassy in Berlin.